

VETERINARY MEDICAL BOARD

ADDENDUM TO INITIAL STATEMENT OF REASONS – 9/4/08

Hearing Date: January 16, 2007

Subject Matter of Proposed Regulations:

To create a limited term eligibility window for unregistered assistant with a minimum of 5-years of directed clinical experience to take the state licensing examination for registered veterinary technicians (RVT).

Section(s) Affected: 2068.7

Specific Purpose of each adoption, amendment, or repeal:

Section 2068.7

Amendment to Proposed Language for Section 2068.7

The specific purpose of this regulatory proposal is to adopt a regulation that would allow unregistered assistants with at least 5 years of work experience to be eligible to take the RVT examination during a limited window of time (January 1, 2009 – December 31, 2009). Such applicants would be required to have their supervising veterinarian(s) certify to their acquisition of specific entry-level skills necessary to perform as RVTs. However, on August 21, 2008, SB 1584 was passed by the Legislature. This bill would amend Business and Professions Code, Section 4841.5, effective January 1, 2009, to require that, for purposes of qualifying to take the RVT examination, all applicants who do not possess a degree from a board approved two year curriculum in veterinary technology must have a combination of both clinical practice experience and education. Accordingly, the Board is modifying section 2068.7 to add an education component to the 7,360 hour of clinical practice component. Specifically, applicants seeking to qualify for the RVT examination would be required to have completed, in addition to the clinical practice component, 24 hours of education in the following veterinary medical areas:

1. Dental prophylaxis and extractions;
2. Anesthetic instrumentation, induction and monitoring
3. Surgical nursing and assisting, including instrumentation, suturing techniques, and application of casts and splints;
4. Radiology and radiation safety; and
5. Diseases and nursing of animals, including zoonotic diseases and emergency veterinary care.

Factual Basis/Rationale

Section 2068.7

The Board is proposing a one-time, limited term eligibility window (no more than 12 months) during which, in lieu of formal education, the Board would accept certification by supervising veterinarians as to the competency of those lay staff persons who had completed 7,360 hours of practical experience in at least five (5) years and who, in the opinion of the veterinarian, are competent to sit for the California RVT exam. One of the reasons for proposing such a category is that there are many unregistered veterinary assistants who have worked in veterinary hospitals for many years, but are not eligible to take the RVT examination because they do not have the required educational background. The Board believes that it is appropriate to allow unregistered assistants that have had an extensive amount of practical experience under the direct supervision of a veterinarian with a limited opportunity to take the RVT examination. In addition, currently an unregistered assistant is not subject to criminal background checks, as are RVTs. Unregistered assistants who work in veterinary hospitals have access to controlled substances. Allowing such persons to take the RVT examination and perhaps eventual registration as a RVT would provide the Board with greater oversight over this group veterinary assistants.

Although the Board believes that the proposed regulation to allow unregistered assistants who have at least 7,360 hours of practical experience to qualify for the RVT State Board Examination is sufficient to ensure RVT competency and to protect the public, the enrollment of SB 1584 which amends Business and Professions Code, Section 4841.5, necessitates the addition of a education component to the regulation.

An applicant can qualify for the RVT examination by completing a board approved two year curriculum in veterinary technology. The Board has established alternative pathways to qualify for the RVT examination. An applicant may qualify for the examination by:

- (1) Graduating from unapproved two year curriculum in animal health technology and completing 18 months of practical experience under the direct supervision of a veterinarian (Regulation 2067);
- (2) Possess a bachelor's degree of science in a field or major related to animal health technology and complete 12 months of practical experience in veterinary medicine (Regulation 2068);
- (3) Complete 300 hours of instruction in (a) Dental prophylaxis and extractions, (b) Anesthetic instrumentation, induction and monitoring, (c) Surgical nursing and assisting, including instrumentation, suturing techniques, and application of casts and splints, (d) radiology and radiation safety; and (e) diseases and nursing of animals, including zoonotic diseases and emergency veterinary care and complete 4,680 hours (36 months) of practical experience in veterinary medicine (Regulation 2068.5).

Section 2068.7 requires an applicant to possess at least 7,360 hours (approximately 5 years) of practical experience. This number of hours of practical experience is considerably more than the practical experience required for the other alternative pathways to the examination. This is because section 2068.7 was intended to allow a limited window of opportunity for unregistered assistants to qualify to take the examination based solely upon their practical experience under the direct supervision of a veterinarian. The Board believes that the extensive amount of practical experience required under proposed section 2068.7 coupled with a requirement that the supervising veterinarian attest to the completion and competency of the applicant were a sufficient basis to not require an educational component for such applicants. SB 1584 would require that such applicants also possess an educational component. The Board believes that persons having at least 7,360 hours of practical experience that have been attested to by the supervising veterinarians are more likely than not to possess the skills, knowledges and abilities to take the RVT examination. Under these circumstances, it did not believe that an extensive education component was necessary. Accordingly it determined that 24 hours education in veterinary technology is appropriate for these applicants.

The educational content for this component was based upon the same educational content required of applicants seeking to qualify for the examination under regulation section 2068.5. This educational content has proven to be an adequate basis for a course in the fundamentals in veterinary technology.

Underlying Data

RVT Committee meeting minutes, April 2006 – October 2007

Veterinary Medical Board meeting minutes, April 2006 – October 2007

Veterinary Medical Board teleconference meeting, September 3, 2008

Business Impact

This regulation may have an adverse economic impact on businesses because it increases the authority of veterinarians and provides for additional options for employers.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.